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EMAIL AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING CORRECTIVE MEASURES STUDY FOR SOLID WASTE
MANAGEMENT UNITS 18, 20, 21 AND 52 NS MAYPORT FL
5/22/2009
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Winters, John

From: Winters, John
Sent: Friday, May 22, 2009 4:05 PM
To: Casey Hudson; Dana Hayworth CIV NAVFAC SE; Darby, Robbie CIV NAVFAC SE; David Siefken; Gus Campana; Joe Gibson; Libby Claggett; Michael Halil; Peterson, Mark; Racine, Diane R CIV NAVSTA MAYPORT, FL. N4E; Washington, Beverly S CIV NAVFAC SE; Wilson, Adrienne T CIV NAVFAC SE
Cc: Winters, John
Subject: CMSs for the 18 SWMU Group and the 19 SWMU Group

Hello Team.

I wanted to make some quick comments concerning the CMS for SWMUs 18, 20, 21, and 52 (I am evaluating the document labeled Revision 1A from 09/07/07) and the CMs for SWMUs 19, 26, 28, and 56 (I am evaluating the document labeled Revision 1 from 06/28/07). First, a general comment. I liked the comments made by Mr. Jim Cason concerning these CMSs. His evaluation was a good start. Now some comments for the SWMU 18 Group:

--Background – Currently FDEP guidance says a minimum of 7 samples is needed to determine background concentrations.

--Going from COIs to COPCs needs work. Page 1-19 needs revising to conform to FDEP regulatory standards.

--Not enough samples and sample locations were used to assess each of these SWMUs. Some of the sample locations chosen at individual SWMUs are suspect. I believe Jim mentions this as well.

--I would like to see Jim's letter that allows 141 ug/L of manganese as background in groundwater.

--Inorganic analytes – Removing inorganic analytes from the COPC list just because they have secondary standards is not appropriate. Additional reasoning needs to be used to remove these contaminants.

--I haven't been "sold" on the fact that BaP can be eliminated at several of these sites because a parking lot was nearby. We need to discuss this.

--I am not convinced that these site should be considered for NFA.

SWMU 19 Group:

--Background – Currently FDEP guidance says a minimum of 7 samples is needed to determine background concentrations.

--Going from COIs to COPCs needs work. Page 1-20 needs revising to conform to FDEP regulatory standards.

--Only one monitor well at SWMU 19? Most of the soil sampling was done outside of SWMU 19. Why?

--Only four soil sample locations were used to assess an old landfill (SWMU 26)? Only four monitor wells were used to assess SWMU 26? Why were they installed in these locations? GW flow direction at the site?

--Need to meet FDEP risk standards for all media, depending on which RMO option you are using.

--Can't eliminate contaminants based on infrequency of detection per Florida Statutes. May use 62-780 and/or 62-770 to achieve site closure depending on risk.

--Inorganic analytes – Removing inorganic analytes from the COPC list just because they have secondary standards is not appropriate. Additional reasoning needs to be used to remove these contaminants.

--Only three monitoring wells and two piezometers to evaluate this large site (SWMU 28)? GW flow direction?

--SWMU 56 has similar concerns as above.

-- I am not convinced that these site should be considered for NFA.

I know we need/would like to get these CMSs for these SWMUs completed but I think we have more work to do (at least with the data that we have on hand). If you have any questions or comments please contact me. Have a GREAT weekend and be safe.

JDW

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